

Wetu Privacy Policy Notice

The revised privacy policy will be effective starting on May 25, 2018

What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with Wetu (for example, attending Wetu events), unless a different privacy policy is displayed. This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. *If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.*

When we refer to “Wetu,” “we,” or “us” in this policy, we mean Wetu B.V., which controls the information Wetu collects when you use the Services. Wetu offers collaborative tools, including our web, desktop, and mobile products, which help you stay organized and communicate with others. We also own and operate a number of websites and offer related services, like support. We refer to all of these products, together with our other services and websites as “Services” in this policy. Following “Data Controller”, “Data Processor”, “Data Subject”, and “processing” will have the same meaning as in the General Data Protection Regulation.

What information we collect about you

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you input it into the Services or otherwise provide it directly to us.

- **Account and Profile Information:** Any information which is collected for the use of the Service for which we are the Data Controller will be held by us in accordance with the General Data Protection Regulation. For example we collect information about your contact information to create an account for you, for marketing and invoicing purposes along with any other communication activities.
- **Content you provide through our products:** It is agreed that that for the purposes of the GDPR you are the Data Controller and we are the Data Processor with regards to information about you, or third parties that you may choose to include and which our Services process on your behalf. This is the information our Services do not exercise responsibility for, or control as per the General Data Protection Regulation. The Services include the various functions on your dashboard such as the Itinerary Builder, admin panel, IBrochure search, and mobile products you use, where we collect and store content that you post, send, receive and share. Example of such content may include the files and links you upload to the Services such adding a profile photo, bio, website link, social media links and other details to your profile information to be displayed in our Services. Other examples of content we collect and store include: files you attach to an itinerary, the name of an Itinerary, your welcome message to your prospect client on the Itinerary, or as part of the email we enable you to send out from our Wetu dashboard, custom content you have added to your account, terms and conditions as part of attached documentation that you included in your admin panel and/or onto the itinerary.
- **Content you provide through our websites:** The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.
- **Information you provide through our support channels:** The Services also include customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our [support team](#), you will be asked to provide contact information, company name, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

- **Payment Information:** We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

Information we collect automatically when you use the Services

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

- **Your use of the Services:** We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the itineraries, content accumulated, itineraries viewed, company details added onto your admin panel, the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services, whether you have logged into the Services and so forth. We also collect information about the teams and people you work with.
- **Device and Connection Information:** We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.
- **Cookies and Other Tracking Technologies:** Wetu and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

Information we receive from other sources

We receive information about you from other Service users, from third party services, related companies, and from our business and channel partners.

- **Other users of the Services:** Other users of our Services may provide information about you when they submit content through the Services. For example, you may

be mentioned by someone else on an itinerary, or a team member with administrator rights may upload content about you to the admin panel. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as another administrator for a trial or enterprise account.

- **Other services you link to your account:** We receive information about you when your company integrates or links a third-party service with our Services. For example, if you integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party (such as a back office) through our Services. For example, you may authorize our Services to access and display service lines from a third-party Tour Operating System within the Services interface. Or you may authorize our Services to sync or import a supplier contact list or address book so that you can easily access those contacts within the Services. The information we receive when you link or integrate our Services with a third-party service is subject to your choice of information you wish to share. It depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.
- **Wetu Partners:** We work with various partners who provide consulting, implementation, training, payment and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We may receive information from some of these partners, such as contact information, company name, and what country you are in.
- **Other partners:** We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in, and engagement with, our Services and online advertisements.

How we use information we collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

- **To provide the Services and personalize your experience:** We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services. For example, we use the username and password you

provide in your account to identify you and enable you access to your account. Our Services also include tailored features that personalize your experience, enhance your productivity, and improve your ability to collaborate effectively with others by automatically analyzing the activities of your team to provide search results, activity feeds that are most relevant for you and your team. For example your team member may have have tagged an itinerary as “family friendly”, you will be able to search “family friendly” itineraries, and your team member’s itinerary will appear in your search. We may use your email domain to infer your affiliation with a particular organization or industry to personalize the communication sent to you..

- For research and development: We are always looking for ways to make our Services smarter, faster, secure, integrated and useful to you.
- To communicate with you about the Services: We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of payment dues, to update you on product developments, share knowledge on industry trends, give advice on how to optimize your use of the Services, provide customer support, and send you technical notices, security alerts, and administrative messages. Depending on your settings, we send you email notifications when you or others interact on the Services, for example, when you post an itinerary. We also provide tailored communications based on your activity and interactions with us. For example, we send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.
- To market, promote, and drive engagement with the Services: We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying Wetu ads on other platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under “Opt-out of communications.”
- Customer support: We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services. Where you give us

permission to do so, we share your information with a Wetu Expert for the purpose of responding to support-related requests.

- For safety and security: We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.
- To protect our legitimate business interests and legal rights: Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.
- Legal bases for processing (for EEA users): If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:
 - We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
 - It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
 - You give us consent to do so for a specific purpose; or
 - We need to process your data to comply with a legal obligation.
- If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services. In which case please email our Privacy team contact to ask to be removed from our database.

How we share information we collect

We make collaboration tools, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

Sharing with other Service users

When you use the Services, we share certain information about you with other Service users.

- **For collaboration:** You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Services display some or all of your profile information to other Service users when you share or interact with specific content. For example, when you create an itinerary, we display your name as itinerary creator, which your team member will be able to see should he search for existing itineraries. You are however able to lock the itinerary to prevent changes to your creation. Similarly, when you allow agent access to make changes to the itinerary you have shared with him, the agent will view your contact details for him to change to his. Please be aware that the itineraries you share are sharable by any recipient of the itinerary link you have shared.
- **Managed accounts and administrators:** If you register or access the Services using an email address with a domain that is owned by your employer or organization, or associate that email address with your existing account and such organization wishes to establish a Wetu services account, certain information about you including your name, contact info, content, and account use may become accessible to that organization's administrator and other Wetu service users, as permitted by your administrator, to provide you additional products and services or to integrate your Wetu Services with products and services. For example, your organization may request that we provide extra security controls around your account to protect information about your organization. If you are the administrator of a business account within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.
- **Community Forums:** Our websites offer publicly accessible blogs, forums, and knowledge platforms like the [Wetu knowledge Base](#). You should be aware that any information you provide in these websites – including profile information associated with the account you use to post the information – may be read,

collected, and used by any member of the public who accesses websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

- **Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under instruction from us, including abiding by policies and procedures designed to protect your information. These service providers are otherwise named as “third party processors” in our Terms of Use, available on our website.
- **Wetu Partners:** We work with third parties who provide consulting, sales, support and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing, like when you agree to us sharing your information with a Wetu Expert for support-related questions.
- **Third-Party systems:** You, your administrator or other Service users may choose to link our Services to an existing system you use, which will change the behavior of the Services. Doing so may give third-party services access to your account and information about you like your name and email address, and any content you choose to use in connection with those third party services. The information we receive when you link or integrate our Services with a third-party service is subject to your choice of information you wish to send through to our Services. You should always check with your third-party services to understand what data may be disclosed to us or shared with our Services. Third-party services policies and procedures are not controlled by us, and this privacy policy does not cover how third-party services use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications

or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please disable the link to our Services.

- **Links to Third-Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.
- **Third-Party Widgets:** Some of our Services contain widgets and social media features, such as the Twitter “tweet” button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

Wetu uses YouTube’s API Services to provide enhanced functionality within our services. By using our services, you acknowledge and agree that YouTube’s API Services are implemented, and [YouTube’s terms of service](#) and [Google’s privacy policy](#) apply to you. Furthermore, any data received from the use of YouTube’s API Services will adhere to Google’s Limited Use as referred to in [Google API Services User Data Policy](#).

- **With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- **Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to:
 1. comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements,
 2. enforce our agreements, policies and terms of service,
 3. protect the security or integrity of our products and services,
 4. protect Wetu, our customers or the public from harm or illegal activities, or
 5. respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

How we store and secure information we collect

Information storage and security

We use data hosting service providers in the E.U. to host the information we collect, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We will respond to requests about this within a reasonable timeframe.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

- **Account information:** We retain your account information until you ask us to delete your account. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.
- **Information you share on the Services:** If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow to make full use of the Services in the future. For example, we continue to store the itineraries you have created should you reactivate your account.
- **Managed accounts:** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. **Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations. We will respond to requests about this within a reasonable timeframe.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator, you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by enabling an integration, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

- **Access and update your information:** Our Services and [related documentation](#) available in our [Wetu knowledge base](#) give you the ability to access and update certain information about you from within the Service. For example, you can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.
- **Deactivate membership to a user or an account:** You or an administrator can change the user names in the enterprise account but you cannot remove the actual user licence. For such action please contact our [support team](#) who will perform the user licence removal for you. Please be aware that deactivating access to an account does not delete your information from that team or enterprise; your information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

- Delete your information: Our Services and [related documentation](#) give you the ability to delete certain information about you from within the Service. For example, you can remove your phone number. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- Request that we stop using your information: In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is a delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.
- Opt out of communications: You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you may continue to receive transactional messages from us regarding our Services. Please note, you may continue to receive generic ads.
- Turn off Cookie Controls: Relevant browser-based cookie controls are described in our Cookies & Tracking Notice.
- You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

Other important privacy information

Notice to End Users

Our products are intended for both personal use and use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the end-users and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Even if the Services are not currently administered to you by an organization, if you are a member of a team administered by an organization, or if you use an email address provided by an organization (such as your work email address) to access the Services, then the administrator of that team or the owner of the domain associated with your organizational email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens.

Enterprise administrators are able to restrict your access to and privileges within the enterprise the administrator controls. In some cases, enterprise administrators can also:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services or your account;
- control your ability to edit, restrict, modify or delete account information;
- change your account information, including profile information or the email address associated with your account;
- access information in and about your account;
- access or retain information stored as part of your account; and
- enable or disable third-party apps or other integrations.

If you are a user, your administrator asserts control over your account or use of the Services, you may not be able to withdraw membership or change the email address associated with your account without administrator approval.

Please contact your organization or refer to your administrator's organizational policies for more information.

Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such

information. If you become aware that a child has provided us with personal information, please contact our [support services](#).

Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

Contact Us

Your information is controlled by Wetu B.V. If you have questions or concerns about how your information is handled, please direct your inquiry to Wetu B.V. and as set forth below;

- Overschiestraat 184
- 1062XK
- Amsterdam
- The Netherlands
- E-Mail: privacy@wetu.com

Appendix 1

In accordance with Article 28 GDPR

This Appendix forms part of the Privacy Policy which acts in quality of the Data Processing Agreement and must be completed and signed by the parties.

Description of the technical and organizational security measures implemented by the data importer in accordance with Clauses 4(d) and 5(c) of the Data Processing Agreement:

1. Pseudonymisation and Encryption (Article 32 Paragraph 1 Point a GDPR; Article 25 Paragraph 1 GDPR)
 - PseudonymisationThe processing of personal data, wherever possible, in such a method/way, that the data cannot be associated with a specific Data Subject without the assistance of additional Information, provided

that this additional information is stored separately, and is subject to appropriate technical and organisational measures.

- EncryptionThe processing of personal data, wherever possible in such a way, that it is ensured, that the data cannot be eavesdropped by unauthorized thirds while being transferred, e.g. by: encryption of communication / data processing, encryption of data carriers in laptops / notebooks, encryption of mobile data carriers, overlapping data over encrypted data networks or tunnel connections (VPN), data transfer between clients and servers is encrypted (SSL, SSH or SFTP)

2. Confidentiality (Article 32 Paragraph 1 Point b GDPR)

- Physical Access ControlNo unauthorised access to Data Processing Facilities, e.g.: magnetic or chip cards, keys, electronic door openers, facility security services and/or entrance security staff, alarm systems, video/CCTV Systems
- Electronic Access ControlNo unauthorised use of the Data Processing and Data Storage Systems, e.g.: (secure) passwords, automatic blocking/locking mechanisms, two-factor authentication, encryption of data carriers/storage media
- Internal Access Control (permissions for user rights of access to and amendment of data)No unauthorised Reading, Copying, Changes or Deletions of Data within the system, e.g. rights authorisation concept, need-based rights of access, logging of system access events
- Isolation ControlThe isolated Processing of Data, which is collected for differing purposes, e.g. multiple Client support, sandboxing;

3. Integrity (Article 32 Paragraph 1 Point b GDPR)

- Data Transfer ControlNo unauthorised Reading, Copying, Changes or Deletions of Data with electronic transfer or transport, e.g.: Encryption, Virtual Private Networks (VPN), electronic signature;
- Data Transfer ControlNo unauthorised Reading, Copying, Changes or Deletions of Data with electronic transfer or transport, e.g.: Encryption, Virtual Private Networks (VPN), electronic signature;

4. Availability and Resilience (Article 32 Paragraph 1 Point c GDPR)

- Availability ControlPrevention of accidental or wilful destruction or loss, e.g.: Backup Strategy (online/offline; on- site/off-site), Uninterruptible Power Supply (UPS), virus protection, firewall, reporting procedures and contingency planning;

- Recovery and back-up concepts (RAID, disk mirroring, etc.);
- Back-ups take place regularly / regularly;
- Rapid Recovery (Article 32 Paragraph 1 Point c GDPR) (Article 32 Paragraph 1 Point c GDPR).

5. Procedures for regular testing, assessment and evaluation (Article 32 Paragraph 1 Point d GDPR; Article 25 Paragraph 1 GDPR)

- Data Protection Management;
- Incident Response Management
- Order or Contract ControlNo third party data processing as per Article 28 GDPR without corresponding instructions from the Client, e.g.: clear and unambiguous contractual arrangements, formalised Order Management, strict controls on the selection of the Service Provider, duty of pre-evaluation, supervisory follow-up checks.